

Title V Renewals - Southern California Gas Company - 12/9/2011
EPA Region 9 Comments

Title V Renewal Permits – Southern California Gas Company – Compressor Stations – EPA Comments regarding all 6 permits

Comment 1:

40 CFR Part 64 – Compliance Assurance Monitoring (CAM)

As stated in 40 CFR 70.6(a)(3)(A), title V permits are required to contain applicable monitoring and recordkeeping requirements, including those required by 40 CFR Part 64 - CAM. Many of the engines and equipment at these facilities are potentially subject to the requirements of CAM. The statement of basis needs to be revised to include a determination of which units are and are not subject to CAM. For those units that are subject to CAM, the owner or operator is required to submit a CAM plan according to 40 CFR 64.4 and the permit should reflect the requirements of an approved CAM plan, as detailed in 40 CFR 64.6(c).

Comment 2:

40 CFR 63 Subpart ZZZZ

Based on recent revisions, engines at area sources of HAP emissions are subject to applicable requirements in the RICE NESHAP. In many cases, existing engines at area sources that are greater than 500 HP are required to meet CO or formaldehyde emission limits (usually achieved through oxidation catalyst). Existing engines not subject to emission limits are required to meet work practice standards. The statement of basis and title V permits do not include any references to the RICE NESHAP and should be revised accordingly. In some cases, such as emergency engines, existing requirements may meet the NESHAP requirements, but the permit needs to identify those overlapping requirements.

Comment 3:

40 CFR 63 Subpart HHH – NESHAP for Natural Gas Transmission and Storage Facilities

This regulation is potentially applicable to these sources. If this regulation does not apply then the statement of basis needs to be updated to reflect the basis for this determination.

Comment 4:

40 CFR 60 Subpart K, Ka, and Kb – Standards of Performance for Petroleum and Volatile Organic Liquid Storage Vessels

These regulations are potentially application to storage tanks at these sources. If this regulation does not apply then the statement of basis needs to be updated to reflect the basis for this determination.

Comment 5:

40 CFR 60 Subpart GG and KKKK – Standards of Performance for Stationary Gas Turbines

These regulations are potentially application to storage tanks at these sources. If this regulation does not apply then the statement of basis needs to be updated to reflect the basis for this determination.

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Comment 6:

Rule 1160 – Internal Combustion Engines

Internal combustion engines greater than 500 HP and located in federal ozone non-attainment areas are required to comply with this rule. All of the title V permits under review have engines greater than 500 HP, but Rule 1160 has not been applied to all of these facilities. The statement of basis should identify why this rule has not been applied (e.g. located in an ozone attainment area).

Comment 7:

Odorant Injection System

The title V permits require a daily leak check for these systems, but it is not clear that there is a corresponding recordkeeping requirement for this monitoring. A log of the results of the daily leak check should be required.

Statement of the Legal and Factual Basis – Southern California Gas Company – Compressor Stations

Comment 8:

Only one statement of basis has been prepared for all six compressor stations. Looking at each permit individually demonstrates that each facility has different types of equipment with different applicable requirements. In the future, a separate statement of basis is recommended for each facility, so that the site specific information can be included. Specifically, the statement of basis should be updated to include:

1. Source-wide emissions information that demonstrates why the source is applicable to title V permitting and whether the source is an area or major source of HAP emissions. (It's noted that an application summary was not provided – see 40 CFR 70.8(a)(1).)
2. The natural gas processing rate(s) and whether the facility uses a glycol dehydration unit.
3. If an otherwise applicable regulation does not apply (e.g. Rule 1160 for Internal Combustion Engines or 40 CFR 63 Subpart HHH for Natural Gas Transmission and Storage Facilities) due to the date of construction, major source status, or other source-specific reason, then the reason should be included in the statement of basis.
4. For each unit, an analysis of whether compliance assurance monitoring (CAM) in 40 CFR Part 64 applies.

Southern California Gas Company - South Needles

Comment 9:

Part III.C – These engines (three rated at 733 bhp) have add-on controls and annual testing requirements but no emission limits. Please verify that there are no emission limits that apply to these units.

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Comment 10:

Part III.D – Two emergency diesel engines – The permit states these units are subject to NSPS (Subpart IIII). The statement of basis should reflect the applicability of this standard and the applicable requirements from Subpart IIII should be included. Existing requirements may meet the NSPS requirements, but the permit needs to identify those overlapping requirements. Recommended permit requirements for Subpart IIII include, but are not limited to: 40 CFR 60.4207(b), 60.4209(a), 40 CFR 60.4211(a), 40 CFR 60.4211(c) and 40 CFR 60.4211(e).

Southern California Gas Company – Kelso Turbine/Compressor Station

Comment 11:

Part III.A – 8400 bhp GE Model Frame 3 turbine – The alternative federal RACT NO_x limit of 225 ppm in District Rule 1159(C)(1)(c) applies to this unit, but the limit is not identified in the permit. This limit should be included in the permit, including the compliance method of good combustion practices. The monitoring and recordkeeping requirements should also include, at a minimum, the requirements in Rule 1159(F)(2).

Comment 12:

Part III.B – 465 HP engine – The engine is described as “465 HP @ 1200 RPM”, but condition III.B.7 limits the RPM to 900 to avoid MACT applicability. The statement of basis states that these facilities are not major sources of HAP emissions and there are no Maximum Achievable Control Technology (MACT) standards that potentially apply. The statement of basis should better describe this situation, including which MACT requirement is being avoided, why the 900 RPM limit is needed, and how it is enforceable as a practical matter.

Southern California Gas Company – Adelanto Turbine/Compressor Station

Comment 13:

Part III.B. – 465 HP engine – Condition III.B.7 limits the RPM to 900 to avoid Rule 1160 and NESHAPs. See similar comment above for the Kelso Turbine/Compression Station.

Southern California Gas Company – Blythe Compression Station

Comment 14:

The size (i.e. hp rating) of the engines in Part III.C and Part III.D have not been identified and the permit should be revised accordingly.

Comment 15:

Part III.C.4 – The origin for the emission limits listed in this condition should be identified and the permit should be revised accordingly.

Comment 16:

Part III.D.4 – The origin for the emission limits listed in this condition should be identified and the permit should be revised accordingly.

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Southern California Gas Company – Newberry Springs Compression Station

Comment 17:

The basis for the emission limits in conditions III.A.8 and III.A.9 (2.0 gr/bhp of NO_x) are not clear, as they appear to be different than the limits listed in Rule 1160 for internal combustion engines.

Comment 18:

Part III.B – 465 HP engine – Condition III.B.7 limits the RPM to 900 to avoid Rule 1160 and NESHAPs. See similar comment above for the Kelso Turbine/Compression Station.

Southern California Gas Company – North Needles Compression Station

Comment 19:

Part III.B.5 – The basis for these emission limits should be identified.

Comment 20:

Part III.B.8.b – The permit should specify the monitoring frequency for the catalyst performance data. Additionally, CAM may apply to these units and should be incorporated as needed.

Comment 21:

Part III.C – These engines (three rated at 733 bhp) have add-on controls and annual testing, but no emission limits. Please verify that there are no emission limits that apply to these units.

Comment 22:

Part III.E – This section lists requirements for non-selective catalytic reduction devices (NSCR) but it is not clear which engines are equipped with the referenced devices. The permit or statement of basis should be updated accordingly.